

National Aeronautics and Space Administration

Kennedy Space Center
Kennedy Space Center, FL 32899

June 29, 2011



CC-A

Reply to Attn of:

TO: Distribution

FROM: CC/Chief Counsel


SUBJECT: Attendance at the STS-135 Pre-Launch Reception Sponsored by Northrop Grumman

On July 6, 2011, Northrop Grumman will host a pre-launch reception in anticipation of the STS-135 launch. The event will be held at the Cocoa Beach Hilton from 6:00 pm to 8:00 pm. Approximately 400 guests have been invited to attend. These guests include corporate and industry executives and workers, members of academia, military leaders, aerospace contractors, area tourism and community leaders, space enthusiasts, representatives of Federal, state, and local government, members of the public, media representatives, and NASA personnel. The approximate value of the reception is \$9.25 per person for the food and beverages.

I find this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). I further determine that there is an Agency interest in NASA personnel attending the event. This event will allow NASA employees to discuss the Space Shuttle program, the International Space Station, and the STS-135 mission, Atlantis' final flight and the final mission of the Space Shuttle program, with the other attendees. In addition, this event is a forum for the attendees to disseminate information on NASA's ongoing activities and to discuss matters of interest to NASA with a diverse group.

Accordingly, NASA employees whose duties do not substantially affect the sponsor may accept an invitation for complimentary attendance at the event. They may also accept invitations for accompanying spouses or guests. NASA employees whose duties may substantially affect the sponsor, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from the Chief Counsel's Office. NASA employees who are in non-career positions for which Executive Order 13490 requires the signing of an ethics pledge may attend only if they make arrangements with the sponsor to reimburse the cost of their attendance and any accompanying spouse or guest.

In addition, Northrop Grumman will provide small items, such as lanyards and pens, with a value of approximately \$6, to the attendees. Attendees are reminded of the \$20 gift exception at 5 C.F.R. § 2635.204(a), which provides that employees may accept gifts valued at no more than \$20 per occasion. Accordingly, in addition to accepting free attendance at the event, NASA employees may accept these items for themselves and guests. NASA invitees are reminded not to exceed the \$50 cap on gifts from one source in a calendar year.

for 
Jerald D. Stubbs
Agency Designee